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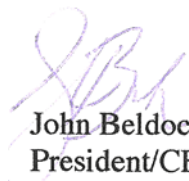
RE: Comments on Draft 1 specification for Energy Star qualified Refrigerated Beverage Vending Machines

Thank you for the opportunity to review the Draft specification. My comments are below:

1. The focus on the new stock of vending machines clearly undercuts what amounts to the order of magnitude larger energy saving potential associated with the existing stock. A wide range of verifiable and cost effective retrofit options is available to the refurbishment centers where refrigerated vending machines are routinely serviced and updated. Though Energy Star typically focuses on new production, based primarily on the ease of verification and on the rapid turn-over of technology in many of the product categories, in the vending machine case the product turn-over is extremely slow (10~20 years). This means that the introduction of these energy savings into mainstream use will also be unnecessarily slow. An EPA Energy Star program in Tier 1 and beyond that partners with the finite number of industry refurbishment centers should be a prerequisite for any move into this industry. Given the limited production capacity and long-turn-over time for the technology, I think a specification that does not allow refurbishment centers to earn the mark for their machines is clearly hard to adequately defend.
2. ASHRAE has very carefully assembled a hands-on group of industry specialists and stakeholders to review and update the current ASHRAE standard 32.1 for refrigerated vending machines. This revision is due out later this year, and represents a substantial improvement over the 1997 Standard proposed for use in the Draft 1 Energy Star specification. Most importantly, the new 32.1 makes a clear attempt to address the range of operating conditions and the 24-7 random nature of vending markets in which vending machines operate. The clause in the proposed Energy Star specification stating that "the low power mode-related controls/software shall be capable of on-site adjustments by the machine owner or property owner" is extremely problematic as it relates to the new ASHRAE work and the real-world operation of vending machines. If machine owners and property owners use timers to create energy savings, this will not only result in lost sales but may also result in compromised product quality. There is also no guarantee that energy savings will occur in a real-world vending environment, one in which the owner/operators may or may not make proper adjustments. The new ASHRAE work, that has already undergone public review, goes out of its way to ensure that timers are not allowed to subject machines and machine owners to extended periods of shut-down and loss of vending activity. The Energy Star specification should not differ in procedure from the new 32.1 Standard, as this would not appear advisable given the immanency of the new ASHRAE Standard. The Energy Star specification's procedure should go out of its way, as does the new ASHRAE Standard, to ensure a level playing field for competing technologies, technologies that do not compromise product quality and/or the ability of the machine to operate and dispense a properly-cooled product at any time in a random-vending operating environment.

Thank you again for your consideration.

Sincerely,



John Beldock, Ph.D.
President/CEO
Environmental Plus, Inc.